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STATE OF ARIZONA
CLERK OF THE COURT

2012 FEB 27 PM 4:44

BY: V REISINGER

5 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

6 INA AND FOR THE COUNTY OF YAVAPAI

7 STATE OF ARIZONA

8 Plaintiff,

9 vs.

10 STEVEN CARROLL DEMOCKER

11 Defendant.

No. P1300CR201001325

MOTION *IN LIMINE* RE: STATE'S
WITNESS RENEE GIRARD

(Oral Argument Requested)

12
13 COMES NOW THE DEFENDANT, by and through his attorney
14 undersigned, and Moves this Court to enter an Order precluding the State's witness
15 Renee Girard from testifying as to a joke Mr. DeMocker made that Ms. Girard
16 claims Mr. DeMocker made in reference to a "hit women" he met though a client in
17 Las Vegas;

18
19 AS GROUNDS THEREFORE, defendant submits that this statement is
20 completely irrelevant and highly prejudicial and should be excluded from trial
21 pursuant to Rules 401 and 403, Arizona Rules of Evidence.

22 In an interview on June 21, 2011, Ms. Girard, a former girlfriend of Mr.
23 DeMocker, indicated she remembered a conversation she had with Mr. DeMocker at
24 dinner. She could not remember the exact date but suspected it was between
25 February and May of 2008. According to Ms. Girard, Mr. DeMocker's youngest
26 daughter and her boyfriend were present as well. Ms. Girard indicated that Mr.

1 DeMocker was jokingly telling a story about how a client had introduced him to a
2 woman in Las Vegas that turned out to be a "hit woman." Ms. Girard said that her
3 impression was that this had happened years ago. Ms. Girard said that she recalls
4 Mr. DeMocker joking making a comment about how maybe he could resolve his
5 divorce in this manner. Ms. Girard was not sure if the story about the "hit women"
6 was even true and she could not remember specifics about the dinner conversation
7 other than she thought it was a joke in poor taste.

8 Assuming this event even occurred; it is completely irrelevant and highly
9 prejudicial to this case and should be precluded pursuant to Rules 401 and 403,
10 Arizona Rules of Evidence. Even though Ms. Girard had previously been
11 interviewed at least 3 times and testified at a pre-trial hearing, Ms. Girard had never
12 revealed this story until June, 21, 2011. Neither Mr. DeMocker's daughter nor her
13 boyfriend remembers this event. As such, any testimony from Ms. Girard
14 regarding this claimed dinner conversation should be precluded from trial.

15 Respectfully submitted this 27 day of February, 2012.

16
17 By 
18 Gregory T. Parzych


19 Original of the foregoing pleading
20 filed this 27 day
of February, 2012, to:

21 Clerk of Court
22 Yavapai County Superior Court
120 South Cortez St.
23 Prescott, Arizona 86303

24 Copy of the foregoing pleading
25 mailed this 27 day
of February, 2012, to:

26 The Honorable Gary E. Donahoe
27 The Honorable David L. Mackey
120 S. Cortez

1 Prescott, AZ 86303
2 Jeffrey Paupore, Steve Young,
3 Office of the Yavapai County Attorney
255 E. Gurley Street, Suite 300
Prescott, AZ 86301

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5 By 
6 Gregory T. Parzych

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